

EXHIBIT 10

From: Houghton-Larsen, M Annie
Sent: Friday, December 27, 2024 9:37 AM
To: Joseph Cammarata, Esq.; Michael Ragusa
Cc: Governski, Meryl Conant; Nathan, Aaron E.
Subject: RE: Freeman v. Giuliani

Follow Up Flag: Follow Up
Flag Status: Flagged

In the event Mr. Ragusa decided to appear notwithstanding his email correspondence earlier this week, I have been waiting with a court reporter and videographer at the time and place noticed in Mr. Ragusa's deposition subpoena. Mr. Ragusa has not appeared today and we have received no indication that he intends to do so. As such, we are packing up.

Neither Mr. Cammarata nor Mr. Ragusa have made any efforts to reschedule the deposition for a time in advance of December 31, 2024 as required by the Court's order. Plaintiffs will provide the Court with an update to this effect.

M. Annie Houghton-Larsen
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Pronouns: she, her, hers

From: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>
Sent: Tuesday, December 24, 2024 3:43 PM
To: Joseph Cammarata, Esq. <Joe@CammarataLawPC.com>
Cc: Michael Ragusa <michael@shutdownsecurity.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>
Subject: RE: Freeman v. Giuliani

Joe,

I resent and reject the accusation that I have been acting disrespectfully. As you know, the reason for my emails today and over the past week regarding depositions have been to ensure that Plaintiffs have done everything possible to ensure the witnesses *Mr. Giuliani wants to call at trial* can be deposed prior to December 31, 2024 *per the Court's deadline*.

Should Mr. Giuliani no longer wish to call any of the disclosed witnesses at trial, please promptly advise. Otherwise, Plaintiffs have no choice but to continue to seek the deposition of all of Mr. Giuliani's witnesses as noticed and scheduled.

Given your email, we will wait to hear back from you on scheduling of depositions for Mr. Giuliani's witnesses before the 31st and otherwise we stand on the current depositions.

Thank you,
Annie

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From: Joseph Cammarata, Esq. <Joe@CammarataLawPC.com>
Sent: Tuesday, December 24, 2024 3:23 PM
To: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>
Cc: Michael Ragusa <michael@shutdownsecurity.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>
Subject: Re: Freeman v. Giuliani

*** EXTERNAL EMAIL ***

Annie,

I think your incessant emails today are disrespectful quite frankly. Nearly all the witnesses and myself are celebrating Christmas at this time. People are going to church and are with families. Just like your office does not want the deposition to go past sundown for Aaron Nathan, I request the same basic courtesy for myself, family and the witnesses.-Joe

Regards,

Joseph Cammarata, Esq.
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On Dec 24, 2024, at 3:18 PM, Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com> wrote:

Joe,

We do not agree to seek modification. The Court was very clear in its order: "No witness will be permitted to testify unless that witness has made full compliance with any interrogatories or document requests and shall have submitted himself or herself to a noticed deposition by December 31, 2024, absent a showing of good cause." If you choose to seek modification, please note that Plaintiffs oppose. Otherwise, please advise which of the below alternative dates work for both you and Mr. Ragusa.

Thank you,

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From: Joseph Cammarata, Esq. <Joe@CammarataLawPC.com>
Sent: Tuesday, December 24, 2024 3:12 PM
To: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>
Cc: Michael Ragusa <michael@shutdownsecurity.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>
Subject: Re: Freeman v. Giuliani

*** EXTERNAL EMAIL ***

Annie,

I wouldn't object to a January 3 deposition in the afternoon. Perhaps we can write the Court?

Regards,

Joseph Cammarata, Esq.
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Staten Island, NY 10314

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On Dec 24, 2024, at 3:08 PM, Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com> wrote:

Mr. Ragusa,

The Court has required all deposition to be completed by December 31, so January 3 will not work. We can accommodate any of the following: December 26 at 12 p.m., December 27 at 6:00 p.m., December 28 at 9 a.m., or December 31 at any time.

Please advise which of the proposed will work and we can adjust accordingly.

Thank you,

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From: Michael Ragusa <michael@shutdownsecurity.com>
Sent: Tuesday, December 24, 2024 2:57 PM
To: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>
Cc: Joseph Cammarata Esq. <Joe@cammaratalawpc.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>
Subject: Re: Freeman v. Giuliani

*** EXTERNAL EMAIL ***

I will not be appearing at this hearing, as a stated, this is to short notice for me to take off from work. I should be with the mayor at his appearance on January 3rd, if you can accommodate me after his hearing, I can do it for you then.

-Michael Ragusa

On Dec 24, 2024, at 09:41, Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com> wrote:

Mr. Ragusa,

We have been unable to serve you with a Rule 45 subpoena for deposition and documents. We have made multiple attempts in person at your home. We have also sent the subpoena to you via email, but you refused to accept service.

You deposition is noticed for December 27, 2024 at 9 a.m. in New York. Preparing for a deposition takes planning—this includes hiring a court reporter and a videographer, organizing breakfast and lunch, and asking Willkie staff to be in the office and working during the holiday week. **To the extent you plan to appear at the deposition as noticed, we ask that you please advise us by the end of the day today, so that we may make the necessary arrangements.**

Thank you,
Annie

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From: Michael Ragusa <michael@shutdownsecurity.com>
Sent: Saturday, December 21, 2024 5:10 PM
To: Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>

Cc: Joseph Cammarata Esq. <Joe@cammaratalawpc.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>
Subject: Re: Freeman v. Giuliani

*** EXTERNAL EMAIL ***

I will not be accepting this subpoena.

-Michael Ragusa

On Dec 20, 2024, at 18:00, Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com> wrote:

Mr. Ragusa,

Thank you again for your time on the phone. You represented that you are not currently represented by counsel in this matter. Please advise if that has changed.

As we discussed, we are seeking to depose you in advance of December 31, 2024, pursuant to the Court's order dated today because it is our understanding that Mr. Giuliani intends to call you at trial to testify on his behalf at the January 16, 2025 trial. You represented that Mr. Giuliani had not told you that he wanted to call you as a witness. I advised that I was only communicating what I knew.

I have attached a copy of the Court order we discussed per your request. I am also attaching a deposition and document subpoena. Please advise whether you will accept this subpoena via email or if we should proceed with serving you at your home address by process server.

Thank you,
Annie

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